

REDACTED VERSION – PUBLICLY FILED

EXHIBIT 1

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3|^{b4}IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

VERSUS TECHNOLOGY, INC.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 04-1231 (SLR)
)	
RADIANSE, INC.)	
)	
Defendant.)	

PLAINTIFF'S RESPONSES TO DEFENDANT'S
FIRST SET OF REQUESTS FOR ADMISSION

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiff, Versus Technology, Inc. ("Versus"), issues the following Responses to Defendant, Radianse, Inc.'s ("Radianse"), First Set of Interrogatories.

REQUEST NO.1

Versus, PTFM, and Alan C. Heller entered into an agreement effective as of January 31, 1997, by which PTFM licensed certain of its technology to Versus (the "PTFM Agreement"). A copy of the PTFM Agreement is attached hereto as Exhibit A

RESPONSE

Admitted.

REQUEST NO.2

Under the PTFM Agreement, Versus is a licensee of U.S. Patents No. 5,572,195 (the "'195 patent") and U.S. Reissue Patent No. 36,791 (the "'791 patent").

RESPONSE

Admitted that Versus is the exclusive licensee of U.S. Patent No. 5,572,195 and U.S.

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Reissue Patent No. 36,791. Otherwise denied.

REQUEST NO.3

Subsequent to the execution of the PTFM Agreement, title to the '195 and the '791 patents was assigned by PTFM to Freshloc.

RESPONSE

Admitted.

REQUEST NO.4

The '195 and '791 patents are owned by Freshloc.

RESPONSE

Admitted.

DATED: March 25, 2005

By: s/ James M. Lennon

George Pazuniak (DE #478)

Gerard M. O'Rourke (DE #3265)

James M. Lennon (DE #4570)

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Attorneys for plaintiff, Versus Technology, Inc.

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CERTIFICATE OF SERVICE

I, James M. Lennon, hereby certify that on this 25th day of March, 2005, I caused a true and correct copy of the foregoing to be served upon the persons indicated below in the manner so indicated:

Via Hand-Delivery and E-Mail (iingersoll(S),vcst.com):

Josy W. Ingersoll (#1088)
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Via E-Mail (spr(%lahive.com):

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Attorneys for Defendant, Radianse, Inc.

s/ James M. Lennon
James M. Lennon (DE #4570)

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EXHIBIT 2

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EXHIBIT 3

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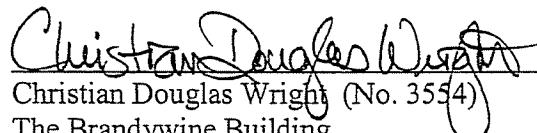
CERTIFICATE OF SERVICE

I, Christian Douglas Wright, hereby certify that on May 12, 2005, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

George Pazuniak, Esquire
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I further certify that on May 12, 2005, I caused a copy of the foregoing document to be served by hand delivery on the above-listed counsel of record.

YOUNG CONAWAY STARGATT & TAYLOR, LLP


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